

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- v. -

RICARDO QUIROGA GUZMAN,
a/k/a "Trillonario,"

Defendant.

- - - - -X

SEALED
INDICTMENT

19 Cr.

19 CRIM 715

COUNT ONE
(Narcotics Importation Conspiracy)

The Grand Jury charges:

1. From at least in or about 2018, up to and including in or about September 2019, in the Southern District of New York and elsewhere, and in an offense begun and committed outside the territorial jurisdiction or any particular state or district in the United States, RICARDO QUIROGA GUZMAN, a/k/a "Trillonario," the defendant, who is expected to be first brought to and arrested in the Southern District of New York and whose point of entry in the United States is expected to be the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RICARDO QUIROGA GUZMAN, a/k/a "Trillonario," the defendant, and others known and unknown, would and did knowingly and intentionally

import into the United States and into the customs territory of the United States from a place outside thereof controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that RICARDO QUIROGA GUZMAN, a/k/a "Trillonario," the defendant, and others known and unknown, would and did manufacture, possess with intent to distribute, and distribute controlled substances, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substances that RICARDO QUIROGA GUZMAN, a/k/a "Trillonario," conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof; and (b) manufacture, possess with intent to distribute, and distribute, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States were (i) 400 grams and more of mixtures and substances containing a

detectable amount of carefentanyl, an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), and fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F); and (ii) 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 960(b)(2)(B).

(Title 21, United States Code, Sections 952(a), 959(a), 959(d), 960(a), 960(b)(1)(F), 960(b)(2)(B), and 963; and Title 18 United States Code, Section 3238.)

COUNT TWO
(Narcotics Distribution for Importation)

The Grand Jury further charges:

5. From in or about May 2019 through in or about July 2019, in an offense begun and committed out of the jurisdiction of any particular State or district, RICARDO QUIROGA GUZMAN, a/k/a "Trillonario," who is expected to be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States is expected to be the Southern District of New York, intentionally and knowingly manufactured, possessed with intent to distribute, and distributed, and attempted to do and aided and abetted the same, a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles

of the coast of the United States, in violation Title 21, United States Code, Sections 959(a), 960(a)(3), and 963.

6. The controlled substance involved in the offense was 100 grams and more of mixtures and substances containing a detectable amount of carfentanil, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 959(a), 959(d), 960(a)(3), 960(b)(1)(F), and 963; Title 18, United States Code, Sections 2 and 3238.)

COUNT THREE
(Narcotics Distribution for Importation)

The Grand Jury further charges:

7. From in or about May 2019 through in or about July 2019, in an offense begun and committed out of the jurisdiction of any particular State or district, RICARDO QUIROGA GUZMAN, a/k/a "Trillonario," who is expected to be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States is expected to be the Southern District of New York, intentionally and knowingly manufactured, possessed with intent to distribute, and distributed, and attempted to do and aided and abetted the same, a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles

of the coast of the United States, in violation Title 21, United States Code, Sections 959(a), 960(a)(3), and 963.

8. The controlled substance involved in the offense was 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 959(a), 959(d), 960(a)(3), 960(b)(1)(F), and 963; Title 18, United States Code, Sections 2 and 3238.)

FORFEITURE ALLEGATION

9. As a result of committing the offenses alleged in Counts One through Three of this Indictment, RICARDO QUIROGA GUZMAN, a/k/a "Trillonario," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

SUBSTITUTE ASSETS PROVISION

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

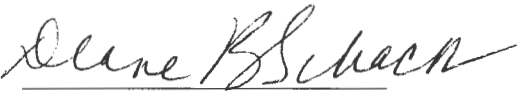
c. has been placed beyond the jurisdiction of the court;

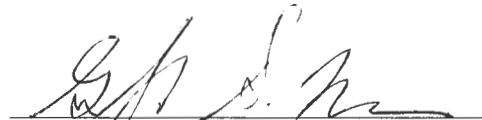
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(21 U.S.C. §§ 952, 959, 960, and 963;
18 U.S.C. § 3238.)

GEOFFREY S. BERMAN
United States Attorney

Marie B. Schuch

Foreperson

Sealed Indictment
True Bill filed
10/7/19

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